



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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November 30, 2012

Ms. Leslie Blake
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, IL 60604-3507
Mail Code: SRF-6J

Dear Ms. Blake:

Re: Site Investigation Data Related to
the Lane Street Groundwater
Contamination Site, Elkhart, Indiana

Staff of the Indiana Department of Environmental Management (IDEM) have reviewed environmental investigation information associated with the Lane Street Groundwater Contamination Superfund site in Elkhart, Indiana that was recently provided by Barnes & Thornburg LLP. As you know, this information, which I understand was also received by your office, was collected separately from the EPA contractor led Remedial Investigation (RI) efforts at the Lane Street Superfund site. The data was collected from multiple sampling events conducted between March 2011 and October 2012 by Roberts Environmental. Included within the data submittal were data summary tables, boring logs and figures prepared by Roberts Environmental and geologic cross-section figures prepared by Conestoga Rovers and Associates (based on the Roberts Environmental data). IDEM offers the following comments on these materials as they relate to the Lane Street Groundwater Contamination site for your consideration:

- Chlorinated Volatile Organic Compounds (VOCs) contamination was identified in groundwater along the north side of Cooper Drive, including perchloroethylene (PCE) (at concentrations as high as 15.2 µg/L) and trichloroethylene (TCE) (as high as 7.2 µg/L). The groundwater contamination north of Cooper Drive is generally shallow in depth (less than 12 feet below the ground surface (bgs)), although one of the samples contained PCE contamination at the 38-42 feet bgs depth interval. Additional investigation south of Cooper Drive identified TCE groundwater contamination in the 22-26 feet bgs depth interval, which suggests that the

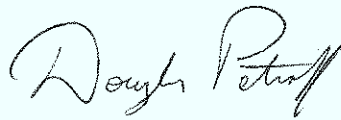
groundwater contamination is sinking as it migrates downgradient. The Roberts investigation has shown that the groundwater contamination north of Cooper Drive is likely related to the groundwater contamination identified at the southwestern corner of the 2503 Marina Drive (former Dygert facility) property and in the former drinking water wells located along Lane Street.

- The Roberts investigation has indicated that the groundwater contamination identified at Lane Street is from a source area located north of Cooper Drive, perhaps located on the 2601 Marina Drive property. While IDEM agrees that a contaminant source located north of Cooper Drive appears to be contributing to the Lane Street groundwater contamination, it is noted that the contamination observed north of Cooper Drive is an order of magnitude lower than the contamination present immediately downgradient of the 2503 Marina Drive property. In order for a source area north of Cooper Drive to be the sole source of groundwater contamination at the 2503 Marina Drive property, it would have been necessary for the center of mass of the contaminant plume to have migrated at least 1,000 feet from the source area. It would be helpful to see calculations that this migration is possible at the site within the historical timeframes of a potential release.
- Extensive soil sampling from 94 soil borings located near the southwestern corner of the 2503 Marina Drive property showed no chlorinated VOC contamination in the upper 4 feet of soil. While this is good evidence that significant surface contaminant spills did not occur in this area, it does not on its own rule out the potential for a release at that property. Given the highly permeable geology of the site, it is possible that contamination released to the unsaturated zone at the property was attenuated via storm water infiltration and/or evaporation. Additionally, it is possible that a release could have occurred underneath the building located on the property.
- Monitoring well MW-14, located on the southwestern corner of the 2503 Marina Drive property, contained TCE groundwater contamination at a concentration of 190 µg/L. Monitoring well MW-10, located immediately north (i.e., upgradient) of this area, did not contain detectable levels of groundwater contamination at that depth interval, which suggests that a shallower source of contamination may be located on the southwestern portion of that property.

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Thank you for the opportunity to provide you with these comments. If you have any questions regarding the comments, please do not hesitate to contact me at (317) 234-7179.

Sincerely,

A handwritten signature in cursive script, reading "Douglas Petroff".

Douglas Petroff, Project Manager
Federal Programs Section
Office of Land Quality

DP:bl
cc: Rex Osborn, IDEM

If you would like to provide IDEM with feedback on our job performance, please go to <http://www.in.gov/idem/5681.htm> and complete our "Remediation Program Customer Satisfaction Survey." Your responses are anonymous and we appreciate the feedback on what we are doing well and what we need to improve.